

Jason Van Dyke

From: Jason Van Dyke
Sent: Wednesday, October 24, 2018 10:38 AM
To: 'Jeffrey Dorrell'; 'Kristin Brady'
Subject: Discovery Hotline Conference Request
Attachments: Mr Jason L Van Dyke.vcf

Dear Mr. Dorrell:

As you may or may not be aware, there is a deposition tomorrow for Mr. Retzlaff for one of the multiple disciplinary proceedings that he has filed against me with the State Bar of Texas. I have learned in discovery that Mr. Retzlaff is under the impression that Judge Mazzant's order in my civil case involving your client grants him the right to refuse to answer my questions at tomorrow's deposition. I would like to get with you, and Ms. Brady if she wishes to be on the call, to contact the discovery hotline for the U.S. District Court for the Eastern District of Texas this afternoon concerning Mr. Retzlaff's position on this matter. Simply put, it is my opinion that Judge Mazzant's order grants him the right to refuse to answer my questions in a deposition for an entirely different matter – even if some of my questions involve fact issues which may be common to both matters.

I understand from talking to Ms. Devlin that you are out sick today and I certainly do not wish to disturb you, but I thought it best to have this matter resolved in advance of tomorrow's deposition so as to avoid the need of calling the court during the actual deposition.

I am copying Kristin Brady from the Office of the Chief Disciplinary Counsel on this correspondence.



Mr. Jason L. Van Dyke
The Van Dyke Law Firm P.L.L.C.

108 Durango Drive
Crossroads, TX 76227
(469) 964-5346 Work
(972) 421-1830

jason@vandykelawfirm.com